

EXHIBIT 1

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IPPs respectfully seek to amend their class definition as follows:

All persons and entities who, during the Class Period, indirectly purchased one or more standalone Interior Molded Doors in the Indirect Purchaser States, not for resale (“indirect purchasers”) that were manufactured or sold by Defendants. For avoidance of doubt, standalone Interior Molded Doors do not include any product or service that incorporates Interior Molded Doors as a component.

Specifically excluded from the Class are the following:

- a. Purchasers of standalone Interior Molded Doors directly from Defendants;
- b. Purchasers of standalone Interior Molded Doors for resale;
- c. The officers, directors or employees of any Defendant;
- d. Any entity in which any Defendant has a controlling interest; and any affiliate,
- e. Legal representative, heir or assign of any Defendant; and
- f. Purchases of standalone Interior Molded Doors directly from Menards.